Statement of Basis of the Federal Operating Permit

Owens Corning Roofing and Asphalt, LLC

Site/Area Name: Houston Roofing and Asphalt Facility
Physical location: 8360 Market Street Rd
Nearest City: Houston
County: Harris

Permit Number: O1543
Project Type: Renewal

Standard Industrial Classification (SIC) Code: 2952
SIC Name: Asphalt Felts and Coatings

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

A description of the facility/area process description;
A basis for applying permit shields;
A list of the federal regulatory applicability determinations;
A table listing the determination of applicable requirements;
A list of the New Source Review Requirements;
The rationale for periodic monitoring methods selected;
The rationale for compliance assurance methods selected;
A compliance status; and
A list of available unit attribute forms.

Prepared on: April 15, 2015

Operating Permit
Basis of Determination

Permit Area Process Description

Asphalt Plant: Asphalt and other raw materials are shipped in trucks. They are unloaded by hose directly into tanks. Raw materials and finished asphalt products are kept hot in tanks through: insulated tanks, gas burners firing into serpentine fire-tubes in the tank bottom, direct-fired process heaters, and/or steam coils. Many tanks use agitators to aid in heat transfer in mixing. In some cases, modifiers such as surfactants may be added in small concentrations in these tanks. The material in these tanks may also be circulated through pumps to assist in the mixing of the modifiers.

Asphalt tanks are maintained at or below atmospheric pressure. Asphalt storage tanks are taken out of service at regular intervals for maintenance, and tank lines in all parts of the plant may be cleaned by purging with steam. Tank fumes are routed to regenerative thermal oxidizers, which are electrically heated.

Oxidized asphalt is produced by pumping asphalt either through a direct-fired, not-contact preheater or into the converters. Air is injected into the converter using positive displacement blowers and dispersed with a variety of piping/baffle designs. Various additives can be added at the start of the reaction by pumping liquid additives into the converter. The reaction of the air and asphalt consumes oxygen and produces fumes of water, hydrocarbon, and sulfur compounds. These fumes exit at the top of the converters and pass through a liquid seal within a knock-out tank and are ultimately destroyed in the plant pre-heater/fume incinerator.

The converting reaction generates heat which is controlled by water jackets open to the atmosphere. Water jackets can also be used to cool the batch prior to pump out. For fire protection, steam can be injected into the converter vapor space or into the fume system at any time. When the batch is complete, the material is pumped out of the converter into a tank or directly into trucks. Oil, generated during air blowing, is collected in knock-out tanks. Asphalt products are loaded into trucks using top entering pipes and splash loading. Asphalt is poured into containers in tow pouring shed and the containers are shipped off-site via trucks. These containers are constructed on-site. Fumes from the loading racks are vented to the regenerative thermal oxidizers.

Roofing Plant: The roofing plant receives raw materials via truck and rail. Asphalt may also be pumped into insulated storage tanks directly from the asphalt plant. Filler and parting agent are stored in silos and surfacing materials are stored in bins. Dust collectors control particulate emissions from the silos and bins. Filler material is received via truck and loaded into the filler storage silo. Emissions from the silo are routed to a dust collector prior to being discharged to the atmosphere. From the filler silo material is loaded into the upper surge hopper. Emissions from the upper surge hopper are routed to a dust collector prior to being discharged to the atmosphere. From the upper surge hopper the filler material is heated in the filler heater, which is natural gas fired. The heated filler material is then transferred to the lower surge hopper.

Parting agent is received by truck and loaded into parting agent storage. Surfacing material is received via truck and transferred to surfacing material mini-bins. Asphalt is stored in tanks which are situated at the asphalt plant, prior to use in the coating process. Molten adhesive is received via truck or directly from the asphalt plant and transferred into the adhesive bulk tank storage.

The manufacturing process begins with a roll of base material placed on a reel and unwound onto a dry looper. The looper acts as a reservoir of base material and allows for continuous operation of the process. Coating asphalt may be heated prior to mixing with filler material. In the coating process mat is coated with mixture of asphalt and filler from the coater surge tank. From the coated mat is routed to the material surfacing area. In the material surfacing area, parting agent and surfacing material are applied to the hot mat. From the material surface area, the coated mat is transferred to the cooling section to reduce the material temperature. Three general venting stacks exhaust to the atmosphere from the roofing area.

Sealant and adhesive are stored and mixed prior to being sent to the laminator for use in laminated shingle production. The adhesive system consists of a 15000 gal bulk tank, and adhesive mix tank and an adhesive use tank, an adhesive applicator, a filler hopper and adhesive melt tank. Emissions from these are routed to the fiber bed filter. The sealant system consists of similar components. The emissions are routed to a fabric filter.

From the cooling section the coated and cooled material is transferred to a laminator where sealant and laminate adhesive are applied. From the laminator the finished product is cut to length and packaged and labeled.

FOPs at Site
The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

Major Source Pollutants
The table below specifies the pollutants for which the site is a major source:

Major Pollutants	SO2

Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
    - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
    - Additional Monitoring Requirements
    - New Source Review Authorization Requirements
    - Compliance Requirements
    - Protection of Stratosphere Ozone
    - Permit Location
    - Permit Shield (30 TAC § 122.148)
- Attachments
    - Applicable Requirements Summary
        - Unit Summary
        - Applicable Requirements Summary
    - Additional Monitoring Requirements

    - Permit Shield
    - New Source Review Authorization References
    - Compliance Plan
    - Alternative Requirements
- Appendix A
    - Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting: The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions: The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary: The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the “index number,” detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement: The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be

required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References: All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan: A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements: This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list: This attachment lists the common acronyms used when discussing the FOPs.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed either before or after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	No
CAIR (Clean Air Interstate Rule)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the “Permit Shield” attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
EPN A78	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons	
EPN A79	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons	
EPN A97	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
EPN BT4	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons	
EPN R16	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Storage Capacity = Capacity is less than or equal to 1,000 gallons	
FIN R31	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons	
FIN R31	40 CFR Part 60, Subpart Kb	60Kb	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters) Reid Vapor Pressure = Reid vapor pressure is less than 2.0 psia	
FIN R34	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons	
FIN R34	40 CFR Part 60, Subpart Kb	60Kb	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters) Reid Vapor Pressure = Reid vapor pressure is less than 2.0 psia	
FIN R37	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
FIN R37	40 CFR Part 60, Subpart Kb	60Kb	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters) Reid Vapor Pressure = Reid vapor pressure is less than 2.0 psia	
FIN R38	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons	
FIN R39	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons	
FIN R40	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons	
FIN R41	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons	
TANK1	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons	
TANK11	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
TANK16	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
TANK19	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
TANK2	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons	
TANK20	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons	
TANK21	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Storage Capacity = Capacity is greater than 40,000 gallons	
TANK22	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons	
TANK25	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons	
TANK26	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons	
TANK28	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
TANK3	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons	
TANK30	30 TAC Chapter	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
	115, Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
TANK31	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons	
TANK32	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons Control Device Type = Direct-flame incinerator	
TANK33	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons Control Device Type = Direct-flame incinerator	
TANK4	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons	
EPN A109	30 TAC Chapter 115, Loading and Unloading of VOC	R5211	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Only unloading. True Vapor Pressure = True vapor pressure less than 0.5 psia.	
EPN A110	30 TAC Chapter 115, Loading and Unloading of VOC	R5211	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Only unloading. True Vapor Pressure = True vapor pressure less than 0.5 psia.	
EPN A123	30 TAC Chapter 115, Loading and Unloading of VOC	R5211	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Only loading. True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia. Daily Throughput = Loading less than 20,000 gallons per day.	
EPN A15	30 TAC Chapter 115, Loading and Unloading of VOC	R5211	Chapter 115 Control Device Type = Control device other than a flare, vapor combustor, catalytic incinerator, direct flame incinerator, chiller, or carbon adsorption system. Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Vapor Tight = Not all liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Only loading. True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia. Daily Throughput = Daily throughput not determined since 30 TAC § 115.217(a)(2)(A) or 30 TAC § 115.217(b)(3)(A) exemption is not utilized. Control Options = Vapor control system that maintains a control efficiency of at least 90%.	
EPN A16	30 TAC Chapter 115, Loading and Unloading of VOC	R5211	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Only loading. True Vapor Pressure = True vapor pressure less than 0.5 psia.	
S-10	30 TAC Chapter 115, Water	R5131	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
	Separation		Exemption = Any single or multiple compartment VOC water separator which is designed solely to capture stormwater, spills, or exterior surface cleanup waters and is fully covered.	
S-3	30 TAC Chapter 115, Water Separation	R5131	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910. Exemption = Any single or multiple compartment VOC water separator which is designed solely to capture stormwater, spills, or exterior surface cleanup waters and is fully covered.	
S-4D	30 TAC Chapter 115, Water Separation	R5131	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910. Exemption = Any single or multiple compartment VOC water separator which is designed solely to capture stormwater, spills, or exterior surface cleanup waters and is fully covered.	
S-5D	30 TAC Chapter 115, Water Separation	R5131	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910. Exemption = Any single or multiple compartment VOC water separator which is designed solely to capture stormwater, spills, or exterior surface cleanup waters and is fully covered.	
EPN A1	30 TAC Chapter 115, Vent Gas Controls	R5121	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C). Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule. Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 612 ppmv. VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.	
EPN A1	40 CFR Part 63, Subpart AAAAAAA	63AAAAAAA	This is the Fume Incinerator Stack.	The rule citations were determined from an analysis of the rule text and the basis of determination.
EPN R1	30 TAC Chapter 115, Vent Gas Controls	R5121	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 612 ppmv.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.	
EPN R1	40 CFR Part 63, Subpart AAAAAAA	63AAAAAAA	This unit is a Coater.	The rule citations were determined from an analysis of the rule text and the basis of determination.
EPN R15	30 TAC Chapter 115, Vent Gas Controls	R5121	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 612 ppmv. VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
EPN R3	30 TAC Chapter 115, Vent Gas Controls	R5121	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is greater than or equal to 612 ppmv. VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
EPN R4	30 TAC Chapter 115, Vent Gas Controls	R5121	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is greater than or equal to 612 ppmv. VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
EPN R5	30 TAC Chapter	R5121	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
	115, Vent Gas Controls		Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 612 ppmv. VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
EPN R6	30 TAC Chapter 115, Vent Gas Controls	R5121	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 612 ppmv. VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
EPN R7	30 TAC Chapter 115, Vent Gas Controls	R5121	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 612 ppmv. VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
EPN A122	30 TAC Chapter 115, Degreasing Processes	R5412	Solvent Degreasing Machine Type = Cold solvent cleaning machine. Alternate Control Requirement = The TCEQ Executive Director has not approved an alternative control requirement as allowed under 30 TAC § 115.413 or not alternative has been requested. Solvent Sprayed = A solvent is sprayed. Solvent Vapor Pressure = Solvent vapor pressure is less than or equal to 0.6 psia as measured at 100 degrees Fahrenheit. Solvent Heated = The solvent is not heated to a temperature greater than 120° F. Parts Larger than Drainage = No cleaned parts for which the machine is authorized to clean are larger than the	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			internal drainage facility of the machine. Drainage Area = Area is less than 16 square inches. Disposal in Enclosed Containers = Waste solvent is properly disposed of in enclosed containers.	
EPN R86A	30 TAC Chapter 115, Degreasing Processes	R5412	Solvent Degreasing Machine Type = Cold solvent cleaning machine. Alternate Control Requirement = The TCEQ Executive Director has not approved an alternative control requirement as allowed under 30 TAC § 115.413 or not alternative has been requested. Solvent Sprayed = A solvent is sprayed. Solvent Vapor Pressure = Solvent vapor pressure is less than or equal to 0.6 psia as measured at 100 degrees Fahrenheit. Solvent Heated = The solvent is heated to a temperature greater than 120° F. Parts Larger than Drainage = No cleaned parts for which the machine is authorized to clean are larger than the internal drainage facility of the machine. Drainage Area = Area is less than 16 square inches. Disposal in Enclosed Containers = Waste solvent is properly disposed of in enclosed containers.	
CONV5	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility contains a blowing still. Plant Type = Asphalt processing plant. Storage Tanks = The affected facility does not contain one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Material Produced = Material other than non-roofing asphalt. Emissions Control = Afterburner. Saturators = The affected facility does not contain saturators. Construction/Modification Date = On or before May 26, 1981. Catalyst Added = Catalyst is added to the blowing still. Mineral Handling/Storage = None of the affected facilities include any mineral handling or storage facilities. Fuel Type = Fuel other than fuel oils. Alternative Opacity Standard = The EPA Administrator has not approved an alternative opacity standard under 40 CFR § 60.474(g) or no such alternative has been requested.	
CONV5	40 CFR Part 63, Subpart AAAAAAA	63AAAAAAA	CONVERTOR # 5	The rule citations were determined from an analysis of the rule text and the basis of determination.
CONV6	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility contains a blowing still. Plant Type = Asphalt processing plant. Storage Tanks = The affected facility does not contain one or more storage tanks. Construction/Modification Date = Construction or modification was commenced on or before November 8, 1980. Material Produced = Material other than non-roofing asphalt. Emissions Control = Afterburner. Saturators = The affected facility does not contain saturators.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Construction/Modification Date = On or before May 26, 1981. Catalyst Added = Catalyst is added to the blowing still. Mineral Handling/Storage = None of the affected facilities include any mineral handling or storage facilities. Fuel Type = Fuel other than fuel oils. Alternative Opacity Standard = The EPA Administrator has not approved an alternative opacity standard under 40 CFR § 60.474(g) or no such alternative has been requested.	
CONV6	40 CFR Part 63, Subpart AAAAAAA	63AAAAAAA	CONVERTOR # 6	The rule citations were determined from an analysis of the rule text and the basis of determination.
EPN BT4	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility does not contain a blowing still. Plant Type = Asphalt processing plant. Storage Tanks = The affected facility contains one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Material Stored = Material other than non-roofing asphalt. Emissions Control = Afterburner. Saturators = The affected facility does not contain saturators. Construction/Modification Date = After May 26, 1981. Mineral Handling/Storage = None of the affected facilities include any mineral handling or storage facilities.	
EPN R1	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility does not contain a blowing still. Plant Type = Asphalt roofing plant. Storage Tanks = The affected facility does not contain one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Saturators = The affected facility contains one or more saturators. Material Produced/Final Product = Asphalt shingles. Mineral Handling/Storage = None of the affected facilities include any mineral handling or storage facilities. Construction/Modification Date = The saturator was newly constructed or modified on or after November 18, 1980.	
EPN R11A	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility does not contain a blowing still. Plant Type = Asphalt roofing plant. Storage Tanks = The affected facility does not contain one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Saturators = The affected facility does not contain saturators. Mineral Handling/Storage = At least one of the affected facilities include any mineral handling or storage facilities. Emissions Control = Control device other than an afterburner, electrostatic precipitator or high velocity filter.	
EPN R15	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility does not contain a blowing still. Plant Type = Asphalt roofing plant.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Storage Tanks = The affected facility does not contain one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Saturators = The affected facility does not contain saturators. Mineral Handling/Storage = At least one of the affected facilities include any mineral handling or storage facilities. Emissions Control = Control device other than an afterburner, electrostatic precipitator or high velocity filter.	
EPN R18A	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility does not contain a blowing still. Plant Type = Asphalt roofing plant. Storage Tanks = The affected facility does not contain one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Saturators = The affected facility does not contain saturators. Mineral Handling/Storage = At least one of the affected facilities include any mineral handling or storage facilities. Emissions Control = Control device other than an afterburner, electrostatic precipitator or high velocity filter.	
EPN R18B	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility does not contain a blowing still. Plant Type = Asphalt roofing plant. Storage Tanks = The affected facility does not contain one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Saturators = The affected facility does not contain saturators. Mineral Handling/Storage = At least one of the affected facilities include any mineral handling or storage facilities. Emissions Control = Control device other than an afterburner, electrostatic precipitator or high velocity filter.	
EPN R18C	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility does not contain a blowing still. Plant Type = Asphalt roofing plant. Storage Tanks = The affected facility does not contain one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Saturators = The affected facility does not contain saturators. Mineral Handling/Storage = At least one of the affected facilities include any mineral handling or storage facilities. Emissions Control = Control device other than an afterburner, electrostatic precipitator or high velocity filter.	
EPN R30	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility does not contain a blowing still. Plant Type = Asphalt roofing plant. Storage Tanks = The affected facility does not contain one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Saturators = The affected facility does not contain saturators. Mineral Handling/Storage = At least one of the affected facilities include any mineral handling or storage facilities. Emissions Control = Control device other than an afterburner, electrostatic precipitator or high velocity filter.	
EPN R33	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility does not contain a blowing still. Plant Type = Asphalt roofing plant.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Storage Tanks = The affected facility does not contain one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Saturators = The affected facility does not contain saturators. Mineral Handling/Storage = At least one of the affected facilities include any mineral handling or storage facilities. Emissions Control = Control device other than an afterburner, electrostatic precipitator or high velocity filter.	
EPN R9A	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility does not contain a blowing still. Plant Type = Asphalt roofing plant. Storage Tanks = The affected facility does not contain one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Saturators = The affected facility does not contain saturators. Mineral Handling/Storage = At least one of the affected facilities include any mineral handling or storage facilities. Emissions Control = Control device other than an afterburner, electrostatic precipitator or high velocity filter.	
FIN R32	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility does not contain a blowing still. Plant Type = Asphalt roofing plant. Storage Tanks = The affected facility does not contain one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Saturators = The affected facility contains one or more saturators. Material Produced/Final Product = Asphalt shingles. Mineral Handling/Storage = None of the affected facilities include any mineral handling or storage facilities. Construction/Modification Date = The saturator was newly constructed or modified on or after November 18, 1980.	
FIN R35	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility does not contain a blowing still. Plant Type = Asphalt roofing plant. Storage Tanks = The affected facility does not contain one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Saturators = The affected facility contains one or more saturators. Material Produced/Final Product = Asphalt shingles. Mineral Handling/Storage = None of the affected facilities include any mineral handling or storage facilities. Construction/Modification Date = The saturator was newly constructed or modified on or after November 18, 1980.	
FIN R37	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility does not contain a blowing still. Plant Type = Asphalt roofing plant. Storage Tanks = The affected facility contains one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Material Stored = Material other than non-roofing asphalt. Emissions Control = Control device other than an afterburner, electrostatic precipitator or high velocity filter. Saturators = The affected facility does not contain saturators.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Construction/Modification Date = After May 26, 1981. Mineral Handling/Storage = None of the affected facilities include any mineral handling or storage facilities.	
TANK32	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility does not contain a blowing still. Plant Type = Asphalt roofing plant. Storage Tanks = The affected facility contains one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Material Stored = Material other than non-roofing asphalt. Emissions Control = Afterburner. Saturators = The affected facility does not contain saturators. Construction/Modification Date = After May 26, 1981. Mineral Handling/Storage = None of the affected facilities include any mineral handling or storage facilities.	
TANK33	40 CFR Part 60, Subpart UU	60UU	Blowing Still = The affected facility does not contain a blowing still. Plant Type = Asphalt roofing plant. Storage Tanks = The affected facility contains one or more storage tanks. Construction/Modification Date = Construction or modification was commenced after November 8, 1980. Material Stored = Material other than non-roofing asphalt. Emissions Control = Afterburner. Saturators = The affected facility does not contain saturators. Construction/Modification Date = After May 26, 1981. Mineral Handling/Storage = None of the affected facilities include any mineral handling or storage facilities.	

* - The “unit attributes” or operating conditions that determine what requirements apply
** - Notes changes made to the automated results from the DSS, and a brief explanation why

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:
www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:
www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 21768	Issuance Date: 04/17/2013
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.264	Version No./Date: 09/04/2000
Number: 106.371	Version No./Date: 09/04/2000
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.532	Version No./Date: 09/04/2000

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table" or "MAERT for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: CONV5	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart UU	SOP Index No.: 60UU
Pollutant: PM (OPACITY)	Main Standard: § 60.472(b)(5)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: Presence of visible emissions	
Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Unit/Group/Process Information	
ID No.: EPN A122	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Degreasing Processes	SOP Index No.: R5412
Pollutant: VOC	Main Standard: § 115.412(1)
Monitoring Information	
Indicator: Visual Inspection	
Minimum Frequency: Monthly	
Averaging Period: n/a	
Deviation Limit: Non-compliance with the applicable requirements of § 115.412(1)(A)-(F)	
Basis of monitoring: The monitoring option to cover cold cleaner or the open-top vapor cleaner was included in the EPA "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources. In addition to covering the cleaner records of monthly inspections of equipment is an effective way to ensure that the system is operating in accordance with its design.	

Unit/Group/Process Information	
ID No.: EPN BT4	
Control Device ID No.: EPN A124	Control Device Type: Other Control Device Type
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart UU	SOP Index No.: 60UU
Pollutant: PM (OPACITY)	Main Standard: § 60.472(c)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: Presence of visible emissions	
Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Unit/Group/Process Information	
ID No.: EPN R11A	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart UU	SOP Index No.: 60UU
Pollutant: PM (OPACITY)	Main Standard: § 60.472(d)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: Presence of visible emissions	
Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Unit/Group/Process Information	
ID No.: EPN R18A	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart UU	SOP Index No.: 60UU
Pollutant: PM (OPACITY)	Main Standard: § 60.472(d)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: Presence of visible emissions	
Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Unit/Group/Process Information	
ID No.: EPN R18B	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart UU	SOP Index No.: 60UU
Pollutant: PM (OPACITY)	Main Standard: § 60.472(d)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: Presence of visible emissions	
Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Unit/Group/Process Information	
ID No.: EPN R18C	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart UU	SOP Index No.: 60UU
Pollutant: PM (OPACITY)	Main Standard: § 60.472(d)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: Presence of visible emissions	
Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Unit/Group/Process Information	
ID No.: EPN R30	
Control Device ID No.: EPN R30	Control Device Type: Fabric Filter
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart UU	SOP Index No.: 60UU
Pollutant: PM (OPACITY)	Main Standard: § 60.472(d)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: Presence of visible emissions	
Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Unit/Group/Process Information	
ID No.: EPN R33	
Control Device ID No.: EPN R33	Control Device Type: Fabric Filter
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart UU	SOP Index No.: 60UU
Pollutant: PM (OPACITY)	Main Standard: § 60.472(d)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: Presence of visible emissions	
Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Unit/Group/Process Information	
ID No.: EPN R86A	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Degreasing Processes	SOP Index No.: R5412
Pollutant: VOC	Main Standard: § 115.412(1)
Monitoring Information	
Indicator: Visual Inspection	
Minimum Frequency: Monthly	
Averaging Period: n/a	
Deviation Limit: Non-compliance with the applicable requirements of § 115.412(1)(A)-(F)	
Basis of monitoring: The monitoring option to cover cold cleaner or the open-top vapor cleaner was included in the EPA "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources. In addition to covering the cleaner records of monthly inspections of equipment is an effective way to ensure that the system is operating in accordance with its design.	

Unit/Group/Process Information	
ID No.: EPN R9A	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart UU	SOP Index No.: 60UU
Pollutant: PM (OPACITY)	Main Standard: § 60.472(d)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: Presence of visible emissions	
Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Unit/Group/Process Information	
ID No.: FIN R37	
Control Device ID No.: EPN CECO1	Control Device Type: Fabric Filter
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart UU	SOP Index No.: 60UU
Pollutant: PM (OPACITY)	Main Standard: § 60.472(c)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: Presence of visible emissions	
Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Unit/Group/Process Information	
ID No.: TANK32	
Control Device ID No.: EPN A124	Control Device Type: Other Control Device Type
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart UU	SOP Index No.: 60UU
Pollutant: PM (OPACITY)	Main Standard: § 60.472(c)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: Presence of visible emissions	
Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Unit/Group/Process Information	
ID No.: TANK33	
Control Device ID No.: EPN A124	Control Device Type: Other Control Device Type
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart UU	SOP Index No.: 60UU
Pollutant: PM (OPACITY)	Main Standard: § 60.472(c)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: Presence of visible emissions	
Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Compliance Assurance Monitoring (CAM):

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;

2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and

3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information	
ID No.: EPN R15	
Control Device ID No.: EPN R15	Control Device Type: Fabric Filter
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart UU	SOP Index No.: 60UU
Pollutant: PM (OPACITY)	Main Standard: § 60.472(d)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: once per day	
Averaging Period: n/a	
Deviation Limit: Opacity greater than 1%	
Basis of CAM: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Compliance Review
Compliance History Review
1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on 04/10/2015.
2. The compliance history review evaluated the period from 09/01/2009 to 08/31/2014.
Site rating: 0.00 Company rating: 0.00 Complexity points: 9, Not a Repeat Violator.
(High < 0.10; Satisfactory > 0.10 and < 55; Unsatisfactory > 55)
The permit has not changed on the basis of the compliance history or site/company rating.

Site/Permit Area Compliance Status Review
1. Were there any out-of-compliance units listed on Form OP-ACPS? .....No
2. Is a compliance plan and schedule included in the permit? .....No

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
OP-UA3 - Storage Tank/Vessel Attributes
OP-UA4 - Loading/Unloading Operations Attributes
OP-UA5 - Process Heater/Furnace Attributes
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
OP-UA7 - Flare Attributes
OP-UA8 - Coal Preparation Plant Attributes

OP-UA9 - Nonmetallic Mineral Process Plant Attributes
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
OP-UA11 - Stationary Turbine Attributes
OP-UA12 - Fugitive Emission Unit Attributes
OP-UA13 - Industrial Process Cooling Tower Attributes
OP-UA14 - Water Separator Attributes
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
OP-UA16 - Solvent Degreasing Machine Attributes
OP-UA17 - Distillation Unit Attributes
OP-UA18 - Surface Coating Operations Attributes
OP-UA19 - Wastewater Unit Attributes
OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes

OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes